

UNITED STATES DISTRICT COURT

for the

District of Nebraska

United States of America

v.

JOSE DAVID ALVAREZ-JIMINEZ,
YOHALEX GARCIA-VALLADRES, and
ALEXANDER JOSE MAYORA-BLANCO*Defendant(s)*

Case No. 8:25MJ303

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2025 - February 11, 2025 in the county of Adams in the
 District of Nebraska, the defendant(s) violated:*Code Section*

18 U.S.C. § 2113(a)

Offense Description

Attempted Bank Larceny

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

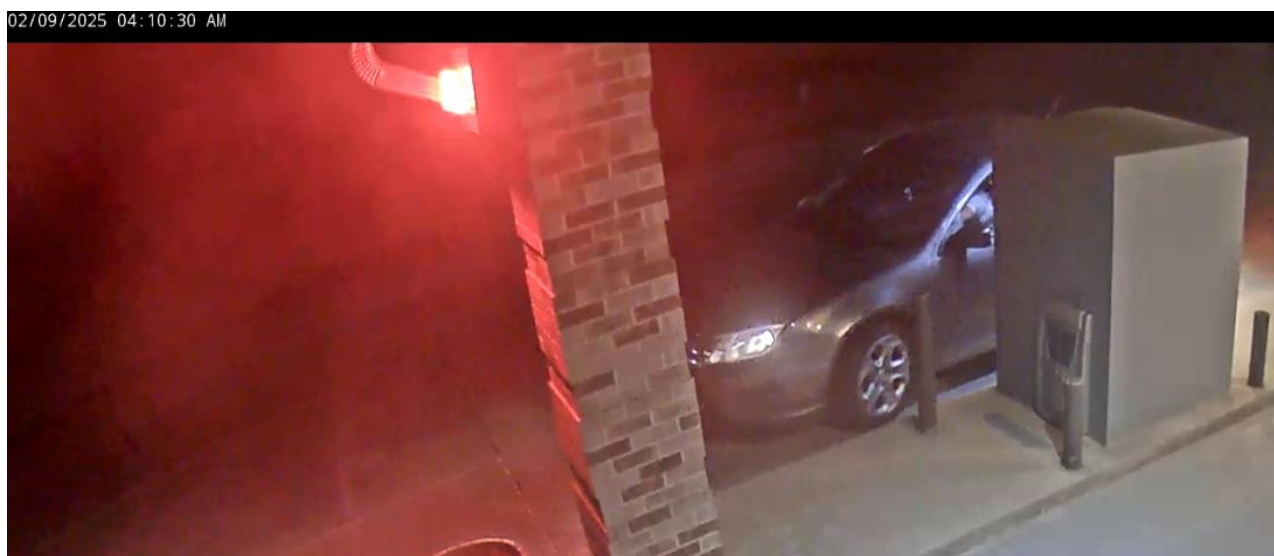
BRANDON STIGGE, TFO FBI

Printed name and title☐ Sworn to before me and signed in my presence.☒ Sworn to before me by telephone or other reliable
electronic means.Date: 5/9/2025*Judge's signature*City and state: Omaha, Nebraska

Michael D. Nelson, United States Magistrate Judge

Printed name and title

7. Deputy Wade Everett and Deputy Kemp of ACSO reviewed surveillance video from the ATM at Adams County Bank. The video depicted three separate vehicles driving through the ATM at 1307 N Brass Ave, Juniata, NE over the course of twelve (12) hours on 2/9/2025. The first vehicle seen at the ATM was a silver sedan, which appears to be a Ford Fusion. The video depicts this vehicle entering Adams County Bank ATM drive-through. A male can be seen rolling down the driver's window and interacting with the ATM. The male can be seen using a device, which appears to be cell phone. It appears as though the male takes a video or photos of the ATM and then drives away. This occurred on 2/9/2025 at approximately 4:10:30 AM. A screenshot of the vehicle can be seen below:



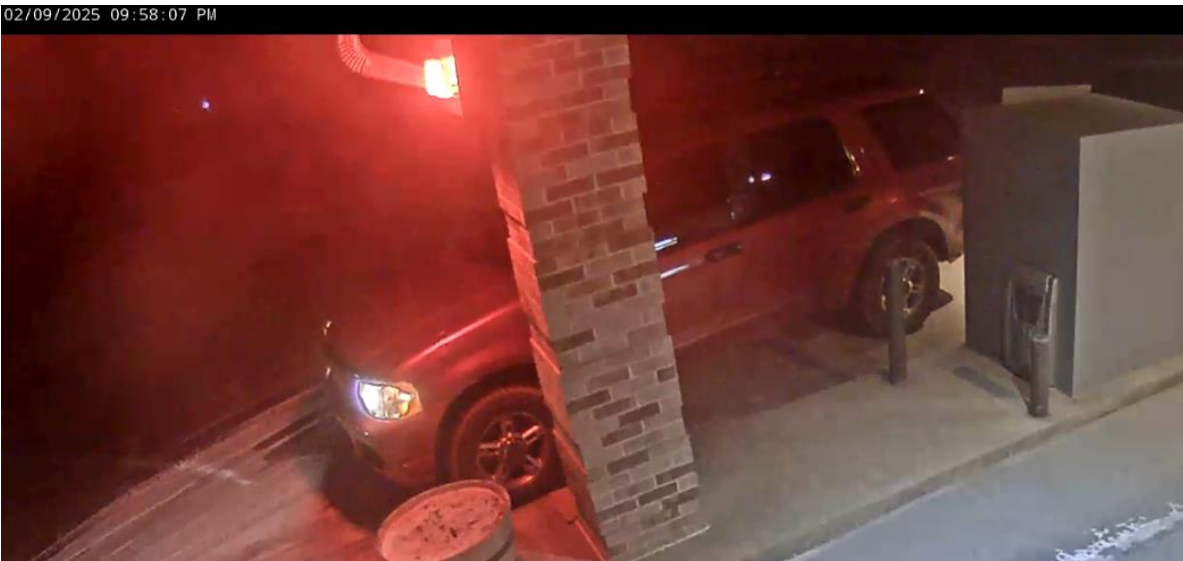
8. A silver vehicle with visible damage and paint missing from the front driver's side panel is seen pulling into the ATM drive-through in Juniata. A male wearing baseball cap and red sweatshirt exits the vehicle and walks up to the ATM. The male accesses the side panel of the ATM. The male attempts this for several moments before re-entering the rear seat. After several seconds, the male exits and stands in front of the ATM. Seconds later the male slides the roll-out panel of the ATM out and appears to manipulate hardware. The male is seen using his cellphone while viewing the inside of the ATM. The male shuts the door and hands the driver something. The male at the ATM re-enters the vehicle and the vehicle drives away. This process is done 17 times from 02/09/25 12:17:00 hours to 02/10/25 00:16:00.

A screenshot of silver vehicle with the visible damage can be seen entering the drive through of the ATM at 7:18:11 PM on 2/9/2025. See below:

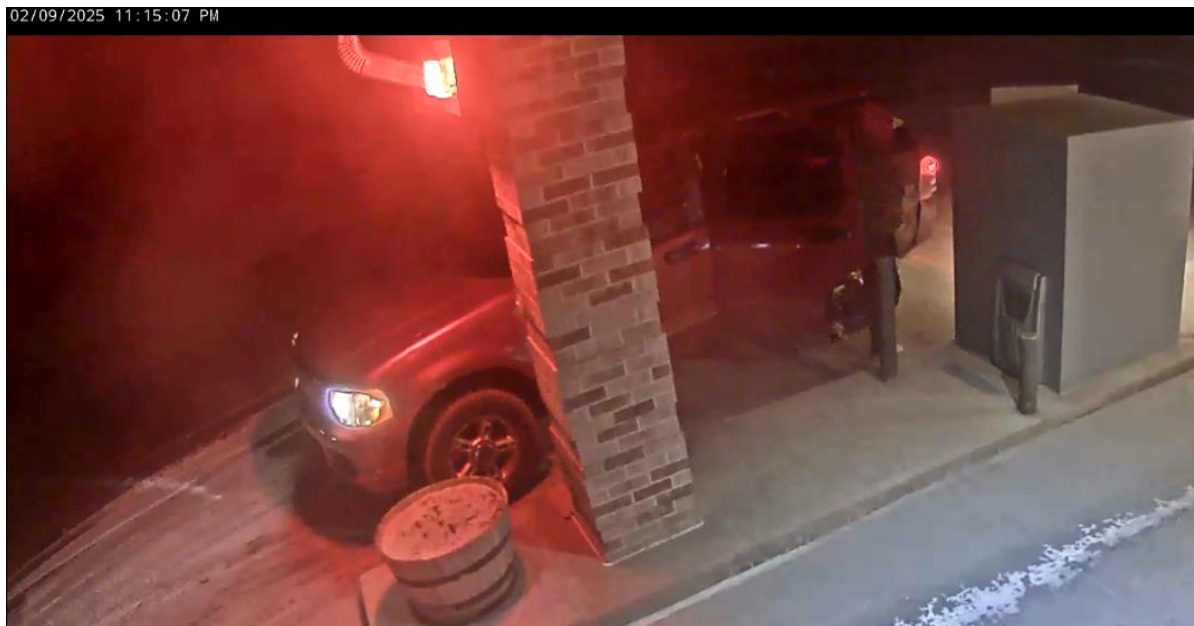


9. During this process, a second vehicle (red Ford Explorer) can be observed pulling to the ATM. The male wearing similar clothing from the silver sedan (Honda) is observed standing at the ATM. This red Ford Explorer has a large decal on the rear driver's side back panel.

A screenshot of red Ford Explorer with the large black decal can be seen entering the drive through of the ATM at 9:58:07 PM on 2/9/2025. See below:



A screenshot of red Ford Explorer with the large black decal can be seen again entering the drive through of the ATM at 11:15:07 PM on 2/9/2025. This time the male exits the vehicle to interact with the ATM. See below:



10. On 2/10/2025 at 2341 hours, Deputy Christopher Costa was patrolling in Hastings, NE when he observed a silver Honda Accord committing a Nebraska traffic violation. Upon further inspection, Dep. Costa was able to determine the vehicle was the same vehicle that was used in the commission of the crime at the ATM in Juniata at Adams County Bank. He conducted a traffic stop and observed the driver of the vehicle to be Jose David Alvarez Jimenez (dob 12/18/1994). Dep. Costa assisted with the vehicle stop earlier that morning and was aware that Alvarez Jimenez was a suspended driver out of Colorado. He also immediately recognized the male in the backseat attempting to lie down, as Yohalex Garcia Valladares. He identified the front seat passenger as Alexander Mayora-Blaco. Dep. Costa, detained all three males and transported them to the Adams County Justice center. Dep. Costa suspected these subjects as the same people that gained access to the ATM in Juanita, NE at the Adams County Bank and stole money.
11. Sgt. Mike Poplau of the ACSO searched the prisoner partition of all three vehicles used to transport. A set of keys were recovered that appear to be keys associated with ATM doors. See below:



Below are samples of keys that can be purchased online for various ATM models and manufacturers. These keys appear to be the same as the ones located on the subjects of the ACSO arrests. See below:



*Stock Photos for Nautilus Hyosung
ATM Door and Top Bezel*



Stock Photo for NCR Self Serv High Secure Key



Jk522 High Security ATM Key

12. Often times, subjects gain access to the internal components of the ATM, after conducting reconnaissance of the machine. Once compromised, hard drives are manipulated or swapped with hard drives already in the machine. Once swapped or manipulated, "commands" can be sent to the compromised system, thus dispensing US currency from the ATM. This technique is often referred to by the term "ATM Jackpotting"¹. Based on the reporting, it appears that the subjects in the vehicle had not been able to complete that installation stage as this attempt was unsuccessful and the subjects were unable to dispense any currency from the ATM.
13. Inside of an ATM, there is a computer system that runs software in an effort to manage operations like processing card data, verifying PINs, and handling cash

¹ ATM jackpotting is a type of cyberattack where criminals exploit vulnerabilities in ATMs to force them to dispense cash without debiting an account. It's a form of ATM fraud where attackers use malware or other techniques to manipulate the ATM to dispense money, essentially creating a "jackpot" of cash for themselves.

withdrawals and deposits. These systems usually connect to banking networks for real-time communication. The hardware often includes components like a central processing unit (CPU), memory storage, input devices (keypad, card reader), output devices (screen, printer), and mechanisms for dispensing US currency securely.

14. In many cases, ATM malware detonation is completed in four stages:

Installation: Subjects gain physical access to the ATM, often by gaining unlawful access to the internal components. They install malware using USB drives, removing the drive and installing the malicious code, then reinstalling the original drive, replacing the original drive with a preloaded malicious coded drive, or attaching computing hardware directly to the ATM internal components.

Activation: Once installed, the malware is activated remotely, often through special codes or commands. It bypasses the ATM's security systems and takes control of its operations. In this particular case, a "dispense" command is sent to the ATM in order to eject all of the notes inside the machine.

Manipulation: The malware can command the ATM to dispense US currency, access sensitive data, or disable security features.

Execution: The ATM continues to dispense US currency until it runs out or the malware is deactivated. This process is often quick and discreet.

15. On 2/11/2025, at 0232 hours, Yohalex Alexander Garcia Valladares was read his Miranda Rights, which he waived. He admitted that Alvarez-Jimenez was one of the subjects in the red Ford Explorer at the ATM theft in Juanita, NE. He claimed that he was dropped off at Wal-Mart while this theft occurred. He then denied being at Wal-Mart later in the interview.
16. On 2/11/2025, at 0331 hours, Alexander Jose Mayora-Blanco was read his Miranda Rights, which he waived. He initially denied any involvement in the thefts, but later stated that he traveled to Hastings, NE with Alvarez-Jimenez and Garcia Valladares to "do a job". According to him, they all drove from Denver to Hastings, NE. Once he arrived in Hastings, he learned the job was to steal money from ATMs. Mayora-Blanco said that he was going to "run" when the deputies initiated the traffic stop, and stated that while the deputy was approaching the vehicle on the stop, Alvarez-Jimenez game him the ATM keys to "hold onto". He added that he was paid \$1,500.00 USD for his involvement in the theft of money. He said that the money would be found in a white duffle bag in the back of the silver Honda Accord that was seized during the traffic stop.
17. On 2/11/2025 at 0540 hours, Jose David Alvarez-Jimenez was read his Miranda Rights, which he invoked. He requested an attorney and questioning ceased.
18. The ACSO executed an Adams County Search Warrant on the red Ford Explorer as well as the silver Honda Accord. Nothing of evidentiary interest was located in the Explorer. Several items were located in the Honda to include seventy five (75) \$20 bills in a black and white striped bag, referenced by Jose Mayora-Blanco. Receipts were located from a Wal-Mart, as well as four (4) cell phones, a Logitech keyboard, and thirty (30) \$20 bills in a brown wallet.
19. On 2/14/2025, Adams County Bank Manager, Dwight Junker contacted ACSO and advised that an ATM at McCook National Bank in Burlington, Colorado experienced an ATM malware attack in which they observed a silver Honda

- Accord drive through an ATM located at their branch at 17999 Hwy 385 Burlington, CO 80807 on 2/8/2025 at 7:48 PM. A male wearing a green coat, red hoodie and Miami Dolphins baseball cap is seen walking up to the ATM in what appears to be an effort to inspect the ATM. At approximately 9:00 PM, the same silver Honda Accord arrives again, and the same male as before exits the vehicle, opens the ATM and removes the hard drive from the ATM. According to the McCook National Bank Manager, they do not return.
20. Sgt. Chris Gramm of the ACSO was able to review the surveillance video and determined the vehicle used in the commission of the crime in Burlington, CO was the same vehicle.

A screenshot taken from the ATM at McCook National Bank, on 2/8/2025 at 21:00:14 hours.



A screenshot was taken from the ATM in Juniata, NE at Adams County Bank. This occurred at 2/9/2025 at 10:09:30 PM.



For comparison, below is a picture of the Honda Accord seized and subsequently searched by ACSO:



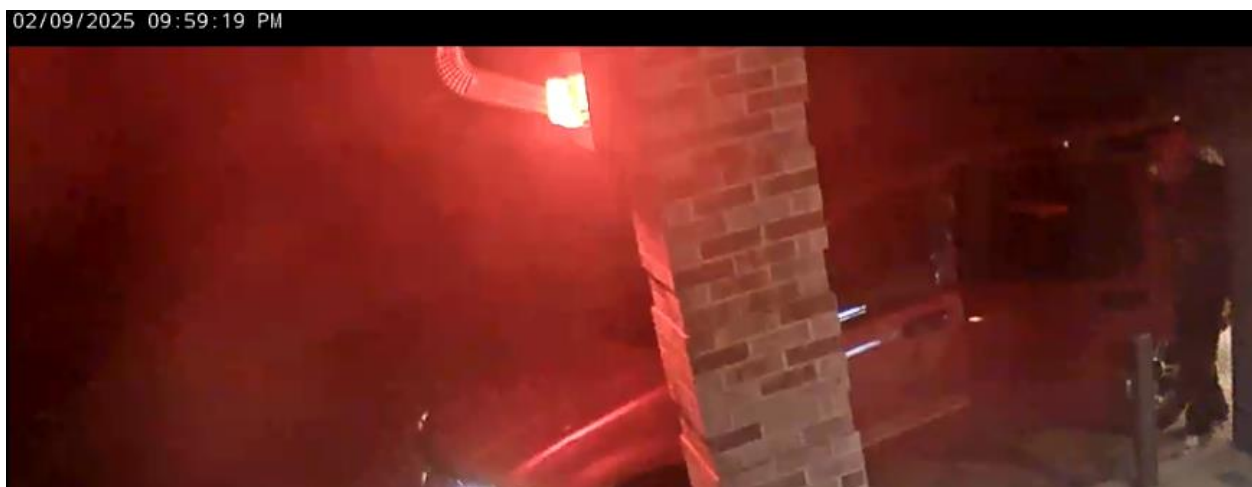
A screenshot taken from the ATM at McCook National Bank, on 2/8/2025 at 21:00:39 hours, depicts a male with a green coat, a red hooded sweatshirt, and a baseball cap with a dark colored face covering can be seen. See below:



A screenshot of the male with a baseball cap, and what appears to be a face covering at Adams County Bank ATM in Juniata, NE can be seen exiting the silver Honda Accord on 2/9/2025 at 7:14:29 PM. See below:



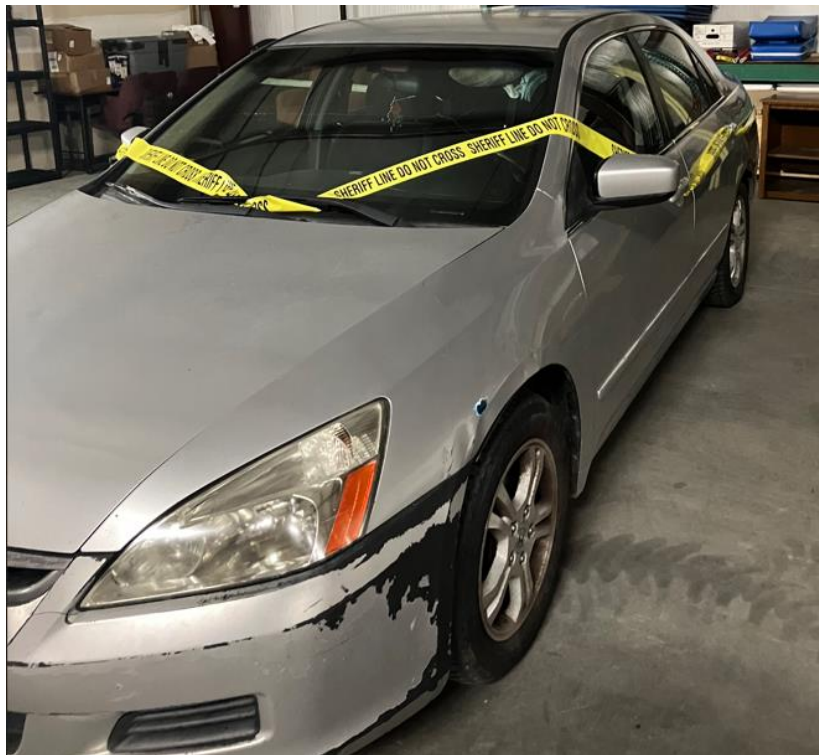
A screenshot of the male with a baseball cap, and a red hooded sweatshirt Adams County Bank ATM in Juniata, NE can be seen exiting the red Ford Explorer on 2/9/2025 at 9:59:19 PM. See below:



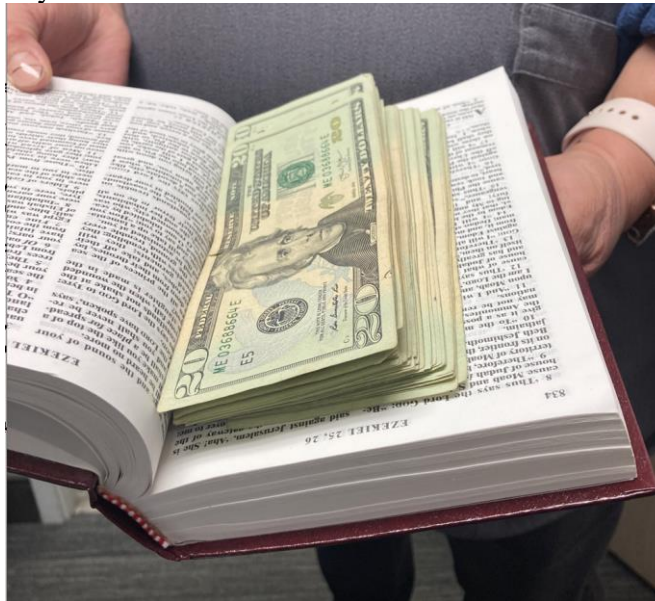
Below is a screenshot of the vehicle was seized and searched by the ACSO. This vehicle was described as a red Ford Explorer. This is the vehicle seen in the ATM footage at Juniata, NE at Adams County Bank.



Below is a screenshot of the vehicle was seized and searched by the ACSO. This vehicle was described as a silver Honda Accord. This is the vehicle seen in the ATM footage at Juniata, NE at Adams County Bank.



21. ACSO Deputies learned that these subjects were staying at a Motel 6 in Grand Island, NE at 7301 Bosselman Ave. According to representatives from Motel 6, separate rooms were rented on 2/10/2025 with a checkout date of 2/11/2025. One room was rented by a listed name of Individual 1, with no address. A second room was rented by a listed name of Individual 2 with no address. The third room was rented to by a listed name of Individual 3, with an address in Chicago, IL.
22. Deputy Everett of ACSO met with the Motel 6 manager after the subjects checked out on 2/11/2025. He reported that a housekeeper provided a hotel Bible to Dep. Everett that had \$1,400.00 USD in the middle of the bible. The housekeeper stated that she found this in one of the rooms rented by one of the subjects. Deputies photographed the Bible with the money:



23. Deputies located receipts from Family Dollar, Walgreens and Wal-Mart at Motel 6 subsequent to their search. These stores, all in Hastings, NE, provided video surveillance for ACSO's review. Deputies reviewed video surveillance from all three stores. At Wal-Mart four subjects arrive in the same Honda Accord used in the ATM thefts.
24. The video surveillance, admission and evidence found inside of the vehicles indicate that all three subjects had knowledge and or participated in the execution of the theft of money from the ATM at the Adams County Bank utilizing computing means, after manipulating the hardware of the ATM.
25. A representative of McCook National Bank in Burlington, CO confirmed that at the time of the attempted larceny, the ATM held \$12,430.00 USD
26. Jose David Alvarez-Jimenez, Yohalex Garcia-Valladares, and Alexander Jose Mayora-Blanco are Venezuelan nationals and are presently in ICE custody pending removal proceedings.
27. Based on the foregoing, your affiant submits that there is probable cause to believe that Jose David Alvarez-Jimenez, Yohalex Garcia-Valladares, and Alexander Jose Mayora-Blanco have committed violations of Title 18, United States Code, Section 2113(a).

A handwritten signature in black ink, appearing to read 'Brandon Stigge', with a long horizontal flourish extending to the right.

Brandon Stigge – Task Force Officer
Papillion Police Department Federal Bureau of
Investigation

Sworn to before me by telephone or other reliable electronic means:

Date: May 9, 2025

City and State: Omaha, Nebraska

A handwritten signature in black ink, appearing to read 'Michael D. Nelson', with a long horizontal flourish extending to the right.

Michael D. Nelson, U.S. Magistrate Judge